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7 Attorney for Defendant *Terren Scott Peizer*

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,  
11

12 Plaintiff,

13 v.  
14

15 TERREN SCOTT PEIZER,

16 Defendant.  
17

CASE NO. 23-CR-00089-DSF

**UNOPPOSED APPLICATION AND  
[PROPOSED] ORDER REGARDING  
CONDITIONS OF RELEASE**

1 Defendant Terren Scott Peizer hereby requests as follows:

2 On March 1, 2023, the parties appeared and agreed to Defendant Terren Scott  
3 Peizer's conditions of release, which included a provision restricting Mr. Peizer's travel to  
4 the Central District of California and Puerto Rico. *See* CR 9. In addition, because Mr.  
5 Peizer is in a Location Monitoring Program, court permission is required for any domestic  
6 travel. *See id.* While the parties have agreed – and the Court has ordered – certain  
7 modifications to the conditions of Mr. Peizer's release, the above-referenced travel  
8 restrictions remain. *See* CR 48. The Court previously granted temporary modifications to  
9 these travel restrictions for Mr. Peizer to travel throughout California, and such travel took  
10 place without incident. *See* CR 54 and 55. Since his release on bond, Mr. Peizer has been  
11 compliant with the terms and conditions of his pre-trial release.

12 Mr. Peizer wishes to have a number of in-person meetings with his counsel over the  
13 next few months, many of whom are on the East Coast. Mr. Peizer also has professional  
14 obligations over the next several months in locations throughout the continental United  
15 States that he would also, respectfully, wish to attend in person.

16 Counsel for Mr. Peizer has conferred with the Government, who has informed  
17 counsel that it has no objection to my moving the Court to amend Mr. Peizer's conditions  
18 of release so that he may travel within the continental United States, without curfew  
19 restrictions, with notice to and permission from Pretrial Services (and without also  
20 permission from the Court).

21 Accordingly, for the reasons stated above, Mr. Peizer respectfully requests through  
22 this application that the Court amend Mr. Peizer's Conditions of Release to amend the  
23 restriction on Mr. Peizer's travel so that he may travel within the continental United States,  
24 without curfew restrictions, with notice to and permission from Pretrial Services and  
25 without further order from the Court.

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1 Respectfully submitted,

2 Dated: July 10, 2023

**KING & SPALDING LLP**

3 By: /s/ David K. Willingham

4 David K. Willingham

5 *Attorney for Terren Scott Peizer*